

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

This Document Relates to All Actions

DECLARATION OF YONG ZHOU

1. My name is Yong Zhou and I am the Assistant Director of the Information Technology department at Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”). I am over twenty-one years of age and of sound mind. I am competent to affirm all of the matters set out in this Declaration. Unless otherwise stated, all matters herein are within my personal knowledge.
2. I submit this declaration in response to plaintiffs’ request that ZHP produce WeChat data and messages from its custodians in connection with litigation regarding Losartan and Irbesartan.
3. WeChat is a Chinese social media application developed by Tencent, a Chinese technology and entertainment company. WeChat is widely used within China and combines a large number of personal technology functions into one application, including, for example, video and phone calling, social media access and photo-sharing, banking, mobile payments, shopping, travel booking, rideshare services, food

delivery, and personal fitness tracking. The application can also serve as personal identification when, for example, an individual receives medical treatment at a hospital, and can also be used to access medical records and other confidential, personal information.

4. Individuals in China quite often list their WeChat addresses in their professional contact information because telephone calls through WeChat are common, free of cost, and can be answered on any personal device on which the individual has installed the application. An individual's WeChat address also remains constant. Thus, even if an individual's mobile telephone number were to change over time, that individual would continue to receive audio and video calls through his or her WeChat address without interruption.

5. In my experience, the WeChat application is primarily installed and used on smartphone devices. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]


[REDACTED]

7. [REDACTED]

8. To access a custodian's complete WeChat data, however, it is my understanding that ZHP would need to collect and search the personal smartphones on which the custodians installed the WeChat application. ZHP does not have possession, custody or control over such personal devices and would need to request consent (which may be withheld) from each individual employee at issue.

I declare under penalty of perjury under the laws of the United States that to the best of my knowledge the foregoing is true and correct.

Executed on October 03, 2023 in Linhai.


Yong Zhou

Exhibits 1-2

ZHP has designated the above exhibits as confidential. In accordance with the Court's Confidentiality and Protective order, ZHP will forward the Exhibits to the Court directly via email for its in camera review.